

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YOUFIT HEALTH CLUBS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-12841 (MFW)

(Jointly Administered)

Ref. Docket Nos. 535 & ____

**ORDER AUTHORIZING BUYER TO FILE UNDER SEAL AND REDACT AN
EXHIBIT TO THE DECLARATION OF KAM MIRAMADI OF MACKINAC
PARTNERS REGARDING ADEQUATE ASSURANCE OF FUTURE PERFORMANCE**

Upon the motion to seal (the “Motion to Seal”)² filed by the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”); and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and this Court having found that venue of these cases and the Motion to Seal in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that notice of the Motion to Seal has been given as set forth in the Motion to Seal and that such notice is adequate and no other or further notice need be given; and this Court having found and determined that the relief sought in the Motion to Seal is in the best interests of

¹ The last four digits of YouFit Health Clubs, LLC’s tax identification number are 6607. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at www.donlinrecano.com/yfhc. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 1350 E. Newport Center Dr., Suite 110, Deerfield Beach, FL 33442.

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Motion to Seal.

the Debtors, their estates, their creditors and all other parties in interest; and that the legal and factual bases set forth in the Motion to Seal establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is granted to the extent set forth herein.
2. Pursuant to Bankruptcy Code section 107(b) and Bankruptcy Rule, the Buyer is authorized to file Exhibit A to the Declaration under seal.
3. Unredacted versions of the Declaration shall not be disseminated to anyone other than the Court, the Debtors, the Official Committee of Unsecured Creditors, the United States Trustee, and other parties in interest under a mutually agreed upon non-disclosure agreement, absent express written consent of the Buyer. Such parties shall be bound by this Order and shall keep all confidential information in the Motion strictly confidential and shall not disclose such contents thereof to any party whatsoever.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. The Buyer is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion to Seal.
6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order, including the authority to impose sanctions on any person that violates this Order.